

Title V

Model General Permit Template

SERIES 1 GASOLINE TRANSFER - STORAGE AND DISPENSING SYSTEMS EQUIPPED WITH PHASE I AND II VAPOR RECOVERY

Template # SJV-GS-1-0

~~without~~ gasoline storage tanks with a capacity greater than 250 gallons and
served by Phase I and Phase II vapor recovery systems

excluding aboveground storage tanks with capacity greater
than 19,800 gallons

This template is designed to streamline the Title V permitting process for gasoline dispensing facilities meeting the above qualifications. Applicants for Title V permits choosing to use this template will only have to complete the enclosed template qualification form and submit it with their Title V application.

San Joaquin Valley Unified Air Pollution Control District

**Final
Title V Model General Permit Template
Series 1 Gasoline Dispensing Facilities**

Template No: SJV-GS-1-0

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FINAL DECISION DATE:

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

TITLE V GENERAL PERMIT TEMPLATE SJV-GS-1-0

ENGINEERING EVALUATION

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I. Purpose

The purpose of the proposed template is to streamline the Title V permitting process by identifying the federally applicable requirements for certain gas dispensing facilities and to establish permit conditions which will ensure compliance with such requirements. These conditions will be incorporated into the Title V permit of any facility choosing to make use of the template.

II. Template Applicability

The template applies to gasoline storage and dispensing units which:

have tanks with storage capacity greater than 250 gallons served by Phase I and Phase II vapor recovery, and

are not aboveground tanks with a capacity greater than 19,800 gallons.

The applicability of this template is determined by completion of the Template Qualification Form (TQF) attached as Appendix D. The completed and signed TQF must be submitted with the Title V application.

III. Applicable Requirements

Units may be subject to “federally enforceable “ requirements as well as requirements that are enforceable by the “District-only.” Federally enforceable requirements will be enforceable by the EPA, the District, and the public through Title V permit conditions identified as federally enforceable. District-only requirements represent local or state regulations for which the EPA has no direct enforcement authority. The final Title V permits issued by the District will contain both federally enforceable and District-only requirements.

District-only requirements used in streamlining of multiple requirements will become federally enforceable. There is no streamlining demonstration in this template and therefore no District-only requirements have been addressed. Table 1, Applicable Requirements, does not necessarily include all federally enforceable requirements that apply to gasoline dispensing facilities qualifying to use this template, and it is the source’s responsibility to determine any and all applicable requirements to which the source is subject. Generally, requirements not addressed by this template are those that require a source-specific analysis, or are covered by other templates.

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Table 1. Applicable Requirements

Rule Category	Rule/Regulation	Citation	Description
A	SJVUAPCD Reg. II	2520, 9.1, 9.4.2, 9.5.2, 13.2	Operational, Monitoring and Recordkeeping Requirements, and Permit Shields
A	SJVUAPCD Reg. IV	4621, except section 5.2.2	Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
A	SJVUAPCD Reg. IV	4622	Transfer of Gasoline into Vehicle Fuel Tanks
A	SJVUAPCD Reg. IV	4623, section 5.4 (formerly 463.2, section IV.D)	Storage of Organic Liquids
B	SJVUAPCD Reg. II	2201	New Source Review Rule
B	SJVUAPCD Reg. II	2520 ¹	Federally Mandated Operating Permits
B	SJVUAPCD Reg. IV	4621, section 5.2.2	Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants
C	SJVUAPCD Reg. IV	4403 (formerly 465.3)	Components Serving Light Crude Oil or Gases at Light Crude Oil and Gas Production Facilities and Components at Natural Gas Processing Facilities
C	SJVUAPCD Reg. IV	4623, except section 5.4	Storage of Organic Liquids
C	County Rule	412.1 ²	Organic Liquid Loading
C	County Rule	411.1 ³	Organic Liquid Loading
C	County Rule	411.2 ⁴	Organic Liquid Loading
C	County Rule	412 ⁵	Organic Liquid Loading
C	County Rule	413 ⁶	Organic Liquid Loading
C	County Rule	419 ⁷	Organic Liquid Loading
C	SJVUAPCD Reg. IV	4624	Organic Liquid Loading
C	NSPS, Subpart XX	40CFR\$60.500	Standards of Performance for Bulk Gasoline Terminals

Category “A” rules contain requirements that are directly applicable to the qualifying units; compliance with these applicable requirements will be demonstrated in this engineering evaluation and assured by the template permit conditions. In section IV, Compliance, the federally enforceable requirements from category “A” rules are listed with a discussion of how compliance with these requirements is achieved.

Category “B” rules contain federally enforceable requirements (aside from those listed as Category A) that were not addressed in this template. These may not be all of the federally enforceable requirements for this unit. Requirements from these rules must be addressed by the applicant outside of this template within the Title V application Compliance Plan form (TVFORM-004). Category “B” listing is included in this table as

¹ Other than Category A requirements

² Kern and Tulare

³ Stanislaus and Merced

⁴ San Joaquin

⁵ Fresno, Kings, Stanislaus, Merced, and San Joaquin

⁶ Kern and Tulare

⁷ Madera

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an informational item to assist applicants in this effort.

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Category “C” rules contain requirements which have been determined not to be applicable to qualifying units. A permit shield is proposed for the category “C” rules. An explanation of the determination of non-applicability of Category “C” rules is included in section V, Permit Shield.

IV. Compliance

This section contains a discussion of how compliance is assured with each requirement addressed in this template.

District Rule 2520, 9.1, 9.4.2 and 9.5.2

Section 9.1 requires each permit to include emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance. To insure non-retail service stations only will continue to operate in a manner that conditions specific to retail stations are not applicable to them, condition #3 prohibits operation of the equipment for retail sales.

Section 9.4.2 requires that periodic monitoring be performed if none is associated with a federally enforceable requirement to assure compliance. District Rule 4622 does not specify a monitoring frequency for leak detection. Therefore, conditions #14 and #15 require annual leak inspections to be conducted and that the source maintain an inspection log to assure compliance with leak limits of the rule. District Rule 4622 prohibits operation with certain equipment defects, but does not require any monitoring. Condition #13 has been added to require a monitoring log of identified defects be maintained. Condition #9 specifies an adequate testing frequency (annual testing) to ensure compliance with the prohibition to operate with defects which may not be detected without performance testing the vapor recovery system.

Section 9.5.2 requires all records be maintained for at least five years. Template permit condition #18 requires that all records be maintained for at least five years.

District Rule 4621

This rule requires that gasoline storage tanks be equipped with an ARB-certified Phase I vapor recovery system and that the vapor recovery system be maintained and operated according to manufacturer’s specifications. The rule further requires that no delivery vessel be allowed to operated unless valid state decals are displayed. Aboveground storage tanks must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

Compliance with this rule is assured by permit conditions #4–7.

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District Rule 4622

This rule requires that gasoline storage and dispensing facilities be equipped with an ARB-certified Phase II vapor recovery system and that the vapor recovery system be source tested and maintained in good working order. In the event that specific system defects are found, the rule requires that the defective component be tagged “Out of Order” and shut down until the defect has been repaired. The system cannot be tampered with in any way that affects effectiveness or operation nor can an ARB certified system be removed once installed. Topping off a motor vehicle fuel tank is prohibited. The rule also contains requirements applicable to retail service stations only which require a prominent display of operating instructions along with the posting of a toll-free telephone number to report complaints and hold-open latches on dispensing nozzles.

Compliance with this rule is assured by permit conditions #1, #2, #8–14, and #16.

District Rule 4623, section 5.4

Section 5.4 is the only provision in Rule 4623 which applies equipment covered by this template. Other sections of this rule apply to internal or external floating roof tanks with capacity of 19,800 gallons or more, which are excluded from using this template in the Template Qualification Form.

Section 5.4 of Rule 4623 reiterates the requirement of District Rule 4621 wherein above-ground gasoline storage tanks with capacity of 19,800 gallons or more must be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank.

Compliance with this rule is assured by permit condition #5.

V. Permit Shield

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Title V permit is considered compliance with all applicable requirements upon which those conditions are based.

A permit shield has been granted from the applicable requirements of District Rules 4621, 4622, and 4623, section 5.4, in template permit condition #19.

Permit shields are requested for District Rules 4403 and 4624 and County Rules 412.1 (Kern and Tulare), 411.1 (Stanislaus and Merced), 411.2 (San Joaquin), 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera). Facilities to which these rules are applicable are specifically excluded by template qualification conditions. That is, qualifying units are not equipment used for light crude oil and gas production, natural gas processing, nor organic liquid loading. A permit shield is granted for these rules, and the corresponding county rules referenced

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above, in template permit conditions #20 and #21.

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District Rule 4623, except section 5.4, applies only to internal or external floating roof tanks with capacity of 19,800 gallons or more, which are excluded from using this template in the Template Qualification Form. Therefore, these requirements are not applicable to any unit using this template. A permit shield is granted from these requirements in template permit condition #21.

A permit shield will be granted for 40 CFR 60 Subpart XX because facilities qualifying to use this template are limited to those which are not bulk gasoline terminals.⁸ Pursuant to 40 CFR 60.500(a), Applicability, the affected facility is the total of all the loading racks at a bulk gasoline terminal which deliver liquid product into gasoline tank trucks. Units of qualifying to use this template are not loading racks and would have to be modified significantly, which would require a new permit, to perform as such. A permit shield is granted from these requirements in template permit condition #22.

VI. Permit Conditions

Conditions #1 and #2 will not be applicable to all units using this template and therefore will only be incorporated into the Title V permit for any unit to which they apply as follows: conditions #1 and #2 apply to retail gasoline service stations; condition #3 applies gasoline storage and dispensing facilities which are not retail service stations. Conditions #4 - #22, as follows, will be incorporated into the Title V permit of any facility choosing to make use of template SJV-GS-1-0:

Conditions for Retail Service Stations Only

1. A warning that no person shall top off a fuel tank along with clear operating instructions shall be posted, noticeable and readable from any place from which gasoline may be dispensed. The instructions shall include prominently the SJVUAPCD and/or ARB toll-free number to which complaints regarding the operation of the system may be reported. [District Rule 4622, 5.8]
2. Any gasoline dispensing nozzle which is installed, repaired, or replaced shall be equipped with a hold-open latch. The hold-open latch shall be installed on the nozzle by the original nozzle manufacturer, or if retrofitted, shall be installed using components and procedures approved by the nozzle manufacturer. The requirements of this condition shall not apply to facilities where the use of hold-open latches is prohibited by law or the local fire control authority. [District Rule 4622, 5.10]

Conditions for Storage and Dispensing Facilities, Non-Retail Service Stations Only

3. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 2520, 9.1]

⁸ As defined in 40CFR§60.501 See Appendix A.

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Conditions for All Storage and Dispensing Facilities Qualified to Use this Template

4. Each gasoline storage tank shall be equipped with a permanent submerged fill pipe. [District Rule 4621, 5.1.1]
5. Each aboveground storage tank shall be equipped with a pressure-vacuum valve set to within 10% of the maximum allowable working pressure of the tank. No gasoline shall be placed, stored, or held in any above-ground tank of 250 gallon capacity or more unless it is so equipped. [District Rule 4621, 5.1.2; 4623, 5.4]
6. Each storage tank subject to this permit shall be equipped with an ARB certified Phase I vapor recovery system, which shall prevent at least 95% by weight of all gasoline vapors displaced during the filling of storage tanks from entering the atmosphere. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with an ARB certified Phase 1 system and maintained and operated according to manufacturers specifications. [District Rule 4621, 3.1 and 5.1.1]
7. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank which attest to the vapor integrity of the tank. [District Rule 4621, 5.2.1]
8. Each dispensing system shall be equipped with an ARB certified Phase II vapor recovery system which shall prevent at least 95% by weight of all gasoline vapors displaced during refueling of vehicles from entering the atmosphere. [District Rule 4622, 5.1]
9. Compliance with the requirement of the Phase II system to be 95% effective for displaced vapors is considered to be demonstrated by passing performance tests, at least once every year from the date of the most recent test, or at more frequent intervals, as specified by the ARB Executive Order certifying the system. Facilities that have not been performance tested previously, using the following applicable methods, shall be tested in accordance with BAAQMD Source Test Procedures ST-27 (Dynamic Back Pressure), ST-30 (Static Leak Test Procedure—Underground Tanks), and ST-38 (Static Leak Test Procedure—Aboveground Tanks) no later than: December 31, 1997 (facilities with 2 nozzles), and December 31, 1998 (facilities with 1 nozzle). [District Rules 2520, 9.4.2 and 4622, 5.2, 6.2. 6.3]
10. Each ARB certified vapor recovery system shall be tested within 60 days of major modification or installation, except as otherwise allowed by this permit. For this condition, a major modification is considered to be replacing, repairing, or upgrading 75% or more of the certified system. [District Rule 4622, 6.2.2]
11. The ARB certified vapor recovery system and all of its components shall be maintained in good repair. Any ARB certified gasoline vapor recovery system, which has been installed and has been issued a permit to operate, shall not be removed

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regardless of the amount of gasoline dispensed or how the gasoline is delivered to the facility. [District Rule 4622, 5.3]

12. No gasoline shall be transferred into vehicle fuel tanks if the vapor recovery system contains any defect listed in Section 94006 of Title 17 of the California Code of Regulations or in Section 5.4 of SJVUAPCD Rule 4622 (as amended February 17, 1994) until the defect has been repaired, replaced, or adjusted as necessary to correct the defect, and the District has reinspected the system or has authorized its use pending reinspection. [District Rule 4622, 5.4]

13. Any defects identified shall be tagged "Out of Order"; the tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defect has been repaired, replaced or adjusted. In the case of defects identified by the District, tagged equipment shall be rendered inoperable and the tag shall not be removed until the District has been notified of the repairs, and/or the District has inspected and authorized the tagged equipment for use. A log containing at least the following shall be maintained: date and type of defect identified and date repaired, replaced or corrected. [District Rules 2520, 9.4.2 and 4622, 5.5]

14. Vapor recovery systems and gasoline dispensing equipment shall be maintained leak-free as verified using EPA Test Method 21 and visual inspection. Leak testing shall be performed at least annually and within 60 days of all major modifications. For this condition, a major modification is considered to be replacing, repairing, or upgrading 75% or more of the certified system. A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm as determined using EPA Method 21. [District Rules 2520, 9.4.2 and 4622, 3.6, 5.6]

15. Each operator shall maintain a leak inspection log containing, at a minimum, the following: inspector's name, location and description of component type where any leak is found; date of leak detection, emission level (ppm) if applicable, and date leak is repaired. [District Rule 2520, 9.4.2]

16. No person shall top off a motor vehicle fuel tank. [District Rule 4622, 5.9]

17. No owner or operator shall tamper with, or permit tampering with, the ARB certified vapor recovery system in a manner that would impair the operation or effectiveness of the system. [District Rule 4622, 5.11]

18. Operator shall maintain all records of required monitoring data and support information for inspection for a period of five years. [District Rule 2520, 9.5.2]

19. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 4621 except section 5.2.2 (as amended May 20, 1993), 4622 (as amended February 17, 1994), and 4623, section

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5.4 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2]

20. The requirements of County Rules 412 (Fresno, Kings, Stanislaus, Merced, and San Joaquin), 413 (Kern and Tulare), and 419 (Madera) do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

21. The requirements of District Rules 4403 (as amended February 16, 1995), 4623, except section 5.4 (as amended December 17, 1992), and 4624 (as amended December 17, 1992) do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

22. The requirements of 40 CFR 60 Subparts XX do not apply to this permit unit. A permit shield is granted from these requirements. [District Rule 2520, 13.2]

APPENDIX A

DEFINITIONS
FOR
TEMPLATE #SJV-GS-1-0

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ARB Certified Phase I Vapor Recovery System: system designed for control of gasoline vapor emissions displaced during the filling of gasoline storage tanks at refueling stations and certified by the ARB as having 95% control effectiveness. [District Rule 4621, 3.1 and CARB Phase I Executive Orders]

ARB Certified Phase II Vapor Recovery System: system designed for control of gasoline vapor emissions displaced during motor vehicle fueling operations and certified by the ARB as having 95% control effectiveness. [District Rule 4622, 3.1 and CARB Phase II Executive Orders]

Bulk Gasoline terminal: any gasoline facility which receives gasoline by pipeline, ship or barge, and has a gasoline throughput greater than 75,700 liters per day. Gasoline throughput shall be the maximum calculated design throughput as may be limited by compliance with an enforceable condition under Federal, State or local law and discoverable by the Administrator and any other person. [40CFR§60.501]

Class I Organic Liquid Loading Facility: any facility loading 20,000 gallons or more on any one day of organic liquids with a TVP of 1.5 psia or greater into tank truck, trailers, or railroad cars. [District Rule 4624, 3.2]

Class II Organic Liquid Loading Facility: any facility loading 4,000 gallons or more but less than 20,000 gallons on any one day of organic liquids with a TVP of 1.5 psia or greater into tank truck, trailers, or railroad cars. [District Rule 4624, 3.3]

Gasoline Storage and Dispensing Facility: an aggregate of one or more stationary storage containers, any of which is subject to the provisions of Rule 4621 (Transfer of Gasoline into Stationary Storage Containers, Delivery Vessels, and Bulk Plants) and this rule (District Rule 4622) together with dispensers and control equipment required by the rules. [District Rule 4622, 3.3]

Gasoline: any petroleum distillate or petroleum distillate/alcohol blend or alcohol having a TVP of 1.5 psia or greater under actual storage conditions used as a motor fuel. [District Rule 4621, 3.4]

Delivery vessel: any container having a volumetric capacity in excess of 120 gallons that is used for the transportation of gasoline. This term includes pumps, meters, valves, fittings, pipings, and other appurtenances attached to a tank vehicle and used in connection with the gasoline being transported. Cargo tanks used exclusively for aviation gasoline in agricultural operations, with an annual throughput of 1000 gallons or less, will not be considered delivery vessels for the purpose of this rule. [District Rule 4621, 3.2]

Gasoline bulk plant: any loading facility and associated unloading facilities, storage tanks, and vapor recovery system(s) used to load less than 20,000 gallons in any one (1) day of gasoline to delivery vessels (i.e. tanks trucks or trailers). [District Rule 4621, 3.3]

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Organic Liquid Loading Facility: any aggregate or combination of organic liquid loading and vapor control equipment from the connection at the inlet of the organic liquid pump to and including the nose end connector at the portable delivery trucks and the discharge of the vapor control device(s). [District Rule 4624, 3.8]

Retail Service Station: any new or existing motor vehicle fueling service station subject to payment of California sales tax on gasoline sales. [District Rule 4622, 3.8]

APPENDIX B

VAPOR RECOVERY SYSTEM DEFECTS FOR TEMPLATE #SJV-GS-1-0

Template SJV-GS-1-0

Vapor Recovery System Defects from District Rule 4622 and California Code of Regulation, Title 17, Section 94006.

#	REQUIREMENTS	District Rule 4622	CCR, Title 17, §96004
1	Absence or disconnection of any component required to be used in the Executive Order(s) that certified the system.	X	X
2	A vapor hose which is crimped or flattened such that the vapor passage is blocked or the pressure drop through the vapor hose exceeds by a factor of two or more the requirements in the system certified in the Executive Order(s) applicable to the system.	X	X
3	A nozzle boot which is torn in one or more of the following manners: (1) Triangular-shaped or similar tear 1/2 inch or more to a side, or hole 1/2 inch or more in diameter, or (2) Slit 1 inch or more in length.	X	X
4	For balance nozzles and for nozzles for aspirator and eductor assist-type systems, faceplate or flexible cone that is damaged such that the ability to seal a fill pipe interface is affected for at least 1/4 of the circumference of the faceplate (accumulated).	X	X
5	More than 1/4 of the flexible cone missing from a nozzle on a vacuum-assist type system.	X	X
6	Nozzle shutoff mechanisms which malfunction in any manner.	X	X
7	Vapor return lines, including such components as swivels, anti-recirculation valves and underground piping, which malfunction or are blocked, or are restricted such that a pressure drop through the lines exceeds by a factor of two or more requirements specified in the Executive Order(s) that certified the system.	X	X
8	Vapor processing unit which is inoperative or severely malfunctioning.	X	X
9	Vacuum producing device which is inoperative or severely malfunctioning.	X	X
10	Pressure/vacuum relief valves, vapor check valves, or dry breaks which are inoperative.	X	X
11	Any equipment defect which is identified in an Executive Order certifying a system pursuant to the Certification Procedures incorporated in Section 94001 of Title 17, California Administrative Code, as substantially impairing the effectiveness of the system in reducing refueling vapor emissions.	X	X

APPENDIX C

EPA COMMENTS / DISTRICT RESPONSE
FOR
TEMPLATE # SJV-GS-1-0

Template SJV-GS-1-0

EPA COMMENTS / DISTRICT RESPONSE

The EPA's comments regarding gasoline storage template SJV-GS-1-0 are encapsulated below followed by the District's response. A copy of the EPA's 5/8/97 letter is available at the District. This template is designed for gasoline storage and dispensing systems equipped with CARB certified Phase I and Phase II vapor recovery.

General Comments:

1. EPA COMMENT

The second paragraph of section III, Applicable Requirements, refers to streamlining and says this is discussed in section IV. Since neither GS-1-0 or GS-2-0 contains a streamlining demonstration, this reference should be deleted.

DISTRICT RESPONSE

The reference to section IV has been deleted and a comment added that there has been no streamlining in either template.

2. EPA COMMENT

The requirement of District Rule 4621, section 5.1.1, that the vapor recovery system be "maintained and operated according to manufacturer's specification" must be added to both templates, GS-1-0 and GS-2-0.

DISTRICT RESPONSE

This requirement has been incorporated as follows:

Each storage tank subject to this permit shall be equipped with an ARB certified Phase I vapor recovery system, which shall prevent at least 95% by weight of all gasoline vapors displaced during the filling of storage tanks from entering the atmosphere. The transfer of gasoline from any delivery vessel to any stationary storage container with 250 gallon capacity or more shall not be allowed unless the container is equipped with an ARB certified Phase 1 system and maintained and operated according to manufacturers specifications. [District Rule 4621, 3.1 and 5.1.1]

3. EPA COMMENT

The requirements of section 5.2 of District Rule 4621, which apply to delivery vessels, are not specifically excluded by the Template Qualification Form. Since some source owners and operators may also own the delivery vessels that supply the source, the

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District must either include these requirements in the templates, or not shield sources from that provision of the rule.

DISTRICT RESPONSE

District Rule 4621 has three subsections, 5.2.1, 5.2.2 and 5.2.3. The requirements of subsection 5.2.1 have been added as follows:

No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo tank which attest to the vapor integrity of the tank. [District Rule 4621, 5.2.1]

Subsection 5.2.2 prohibits operation of a gasoline delivery vessel unless it is vapor tight and addresses delivery vessel loading requirements. Sources using this template may or may not own or operated gasoline delivery vessels and therefore this requirement may or may not be applicable to them. The District does not wish to restrict the use of this template nor do we wish to add additional requirements to the template which are not applicable to many of the sources. Therefore subsection 5.2.2 will not be shielded and template users will be required to address this subsection in their source specific application for the unit. Section III, Table 1, Applicable Requirements, has been amended accordingly.

Subsection 5.2.3 is no longer applicable to any facility since the section 4.2 exemption referenced expired on December 1, 1993.

4. EPA COMMENT

The District grants permit shields from District Rule 4624 and 4403 in templates GS-1-0 and GS-2-0, but does not address future applicability of these rule to the sources. Conditions must be added to ensure that an operational change at the source does not trigger the rule.

DISTRICT RESPONSE

The applicability of the referenced permit shields has been restricted to apply to the permit unit and not to the entire source. Units qualifying to use this template will not trigger applicability of District Rules 4624 and 4403 without significant modification, which would require an Authority to Construct and new Operating Permit. Non-applicability of these rules is discussed in section V, Permit Shield.

5. EPA COMMENT

The compliance certification language in the Template Qualification Forms of templates GS-1-0 and GS-2-0 must be made consistent with part 70 requirements.

DISTRICT RESPONSE

The compliance certification language in the Template Qualification Forms of templates GS-1-0 and GS-2-0 has been amended to be consistent with part 70 requirements.

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Template Specific Comments:

6. EPA COMMENT

Please change the reference in section II, Template Applicability for the Template Qualification Form to Appendix C, instead of B.

DISTRICT RESPONSE

The District has consistently attached the Template Qualification Form (TQF) as the last appendix to the template for easy location by the user. This template now contains four appendices so that the final reference for the TQF will be appendix "D".

7. EPA COMMENT

Including the definition of ARB Certified Phase I and II Vapor Recovery Systems to Appendix A would help to clarify the permit requirements.

DISTRICT RESPONSE

The definitions of ARB Certified Phase I and II Vapor Recovery Systems have been added to Appendix A.

8. EPA COMMENT

The District should delete the reference in the Table of Contents of this template to Appendix B as the County Rule/District Rule 1081 Comparison. Appendix B does not contain this comparison.

DISTRICT RESPONSE

District Rule 1081 is not applicable to this template and the reference in the Table of Contents of this template to Appendix B as the County Rule/District Rule 1081 Comparison has been deleted.

Comments on Specific Template Conditions:

9. EPA COMMENT

The District should include sections 3.1 and 5.2.2 of district Rule 4621 in the citation of origin and authority for condition 3 which requires an ARB certified Phase I vapor recovery system with 95% control.

DISTRICT RESPONSE

Section 3.1 of District Rule 4621 defines ARB Certified Phase I Vapor Recovery System and has been added to the citation for this condition (now condition #6). Section 5.2.2 requires 95% control of vapors during loading of delivery vessels, not during filling of stationary storage containers and is not a correct citation for this condition.

10. EPA COMMENT

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District Rule 4622, section 5.3 requires the vapor recovery system and all of its components be maintained “in good repair”, and the system not be removed “regardless of the amount of gasoline dispensed”. We recommend adding these requirements to the conditions.

DISTRICT RESPONSE

The following condition has been added to the template as follows to incorporate requirements of section 5.3, as requested:

- The ARB certified vapor recovery system and all of its components shall be maintained in good repair. Any ARB certified gasoline vapor recovery system, which has been installed and has been issued a permit to operate, shall not be removed regardless of the amount of gasoline dispensed or how the gasoline is delivered to the facility. [District Rule 4622, 5.3]

11. EPA COMMENT

The citation for condition 5 should be section 6.3 instead of 5.3 of District Rule 4622.

DISTRICT RESPONSE

This typographical error has been corrected to cite section 6.3 for this condition (now condition #9), which specifies the testing frequency and test procedures for Phase II vapor recovery systems.

12. EPA COMMENT

Condition 5, which has performance test requirements, does not address the requirement of section 6.2.2 which requires testing “within 60 days of installation or major modification”. The District should add this provision.

In addition, the District should clarify in condition 5 that existing sources will be tested at least once every five years based on their last test date, not the date of permit issuance

DISTRICT RESPONSE

The provision from section 6.2.2 has been added as follows:

- Each ARB certified vapor recovery system shall be tested within 60 days of major modification or installation, except as otherwise allowed by this permit. For this condition, a major modification is considered to be replacing, repairing, or upgrading 75% or more of the certified system. [District Rule 4622, 6.2.2]

Condition #5 (now condition #9) has been amended to clarify the performance test frequency as follows:

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- Compliance with the requirement of the Phase II system to be 95% effective for displaced vapors is considered to be demonstrated by passing performance tests, at least once every year from the date of the most recent test, or at more frequent intervals, as specified by the ARB Executive Order certifying the system. Facilities that have not been performance tested previously, using the following applicable methods, shall be tested in accordance with BAAQMD Source Test Procedures ST-27 (Dynamic Back Pressure), ST-30 (Static Leak Test Procedure—Underground Tanks), and ST-38 (Static Leak Test Procedure—Aboveground Tanks) no later than: December 31, 1997 (facilities with 2 nozzles), and December 31, 1998 (facilities with 1 nozzle). [District Rules 2520, 9.4.2 and 4622, 5.2, 6.2. 6.3]

13. EPA COMMENT

The District should include Section 94006 of Title 17 of the California Code of Regulations (CCR) and Section 5.4 of District Rule 4622, both cited in condition 6, as appendices in the permit. The District should also cite the adoption date and/or amendment dates of District Rule 4622 which is referenced in the condition.

DISTRICT RESPONSE

Condition #6 (now condition #12) prohibits operation with defects listed in Section 94006 of the CCR or in Section 5.4 of District Rule 4622. The defects listed in these two citations are identical and have been added as an appendix to the template to aid the user. To be consistent with other recent templates, the last amendment date of District Rule 4622 has been added to this condition.

14. EPA COMMENT

Condition 7 does not fully capture the requirements of section 5.5 of District Rule 4622. This condition must be revised to prohibit removal of the tag until the District has been notified of the repairs.

DISTRICT RESPONSE

Condition #7 (now condition #13) has been modified as follows:

- Any defects identified shall be tagged "Out of Order"; the tagged equipment shall be rendered inoperable and the tag(s) shall not be removed until the defect has been repaired, replaced or adjusted. In the case of defects identified by the District, the tag shall not be removed until the District has been notified of the repairs, and/or the District has inspected and authorized the tagged equipment for use. A log containing at least the following shall be maintained: date and type of defect identified and date repaired, replaced or corrected. [District Rules 2520, 9.4.2 and 4622, 5.5].

15. EPA COMMENT

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The District must specify a frequency for EPA Test Method 21 for leak detection in condition 8. Also, it may be necessary to add monitoring requirements for the defects specified in condition 6 if they are not obvious during day-to-day business. Also the District must modify condition 8 to include the following language from District Rule 4622, section 5.6, “vapor recovery systems and gasoline dispensing equipment shall be maintained....”

DISTRICT RESPONSE

Condition #8 has been amended to specify a leak test frequency and include additional language from District Rule 4622 as follows:

- Vapor recovery systems and gasoline dispensing equipment shall be maintained leak-free as verified using EPA Test Method 21 and visual inspection. Leak testing shall be performed at least annually and within 60 days of all major modifications. For this condition, a major modification is considered to be replacing, repairing, or upgrading 75% or more of the certified system. A leak is defined as the dripping at a rate of more than three (3) drops per minute of liquid containing VOCs or a reading as methane in excess of 10,000 ppm as determined using EPA Method 21. [District Rules 2520, 9.4.2 and 4622, 3.6, 5.6]

The majority of defects referenced in condition #6 are obvious during day-to-day operation and during source inspection (specifically defect numbers 1-6 and 8-10 listed in Appendix B of the template). Other defects (numbers 7 and 11) may only be detected during performance testing. The District has had numerous discussions with EPA regarding what would be considered adequate monitoring for all defects. Since operation of the certified vapor recovery system with any of these defects is prohibited and some defects may only be detected through performance testing, the EPA required performance testing at least annually. The District will also require additional recordkeeping in the form of a defect log, pursuant to EPA’s verbal comment. See condition #9 in District Response to EPA Comment #12 and condition #13 in District Response to EPA Comment #14.

16. EPA COMMENT

Condition 9 does not fully capture the requirements of section 5.8 and 5.9 of District Rule 4622. We recommend revising the condition to add section 5.9’s requirement that “no person shall top off a motor vehicle fuel tank”.

With regard to the posting of operating instruction at retail service stations, we recommend the District revise condition 9 to reflect the rule language that the posted instructions be “noticeable and readable from any place which gasoline may be dispensed from the facility”.

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Also, the rule allows owners of retail service stations to post both the District's and the ARB's telephone numbers for use to register complaints regarding the operation of vapor recovery system, not just one or the other.

DISTRICT RESPONSE

The District currently has only one Title V facility with a retail service station, however we do not wish to restrict template applicability. To avoid adding unnecessary requirements to the non-retail facilities using this template, we have separated out permit conditions which will be used only for retail service stations from those that will be used only for non-retail stations, as follows:

Conditions #1 and #2 will not be applicable to all units using this template and therefore will only be incorporated into the Title V permit for any unit to which they apply as follows: conditions #1 and #2 apply to retail gasoline service stations; condition #3 applies to gasoline storage and dispensing facilities which are not retail service stations. Conditions #4 - #22... will be incorporated into the Title V permit of any facility choosing to make use of template SJV-GS-1-0:

Conditions for Retail Service Stations Only

1. A warning that no person shall top off a fuel tank along with clear operating instructions shall be posted, noticeable and readable from any place from which gasoline may be dispensed. The instructions shall include prominently the SJVUAPCD and/or ARB toll-free number to which complaints regarding the operation of the system may be reported. [District Rule 4622, 5.8]

2. Any gasoline dispensing nozzle which is installed, repaired, or replaced shall be equipped with a hold-open latch. The hold-open latch shall be installed on the nozzle by the original nozzle manufacturer, or if retrofitted, shall be installed using components and procedures approved by the nozzle manufacturer. The requirements of this condition shall not apply to facilities where the use of hold-open latches is prohibited by law or the local fire control authority. [District Rule 4622, 5.10]

Conditions for Storage and Dispensing Facilities, Non-Retail Service Stations Only

3. This gasoline storage and dispensing equipment shall not be used in retail sales, where gasoline dispensed by the unit is subject to payment of California sales tax on gasoline sales. [District Rule 2520, 9.1] ...

A new condition has been added which addresses the section 5.9 requirement and is applicable to all units using this template as follows:

- No person shall top off a motor vehicle fuel tank. [District Rule 4622, 5.9]

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17. **EPA COMMENT**

The requirements of District Rule 4622 regarding hold-open latches (5.10) and the prohibition against tampering (5.11) must be added to the template conditions.

DISTRICT RESPONSE

Section 5.11 of District Rule 4622 regarding tampering is applicable to all units qualifying to use this template and the following condition has been added to address this requirement:

- No owner or operator shall tamper with, or permit tampering with, the ARB certified vapor recovery system in a manner that would impair the operation or effectiveness of the system. [District Rule 4622, 5.11]

Section 5.10 of the rule regarding hold-open latches is applicable to retail service stations only and the requirement will appear only on retail station permits. See District Response to EPA Comment 16.

18. **EPA COMMENT**

The permit shield from District Rule 4623, except section 5.4, granted in condition 12 should exclude section 5.0 unless the District demonstrates that these requirements could not apply to this type of source.

DISTRICT RESPONSE

District Rule 4623, except section 5.4, applies only to internal or external floating roof tanks with capacity of 19,800 gallons or more, which are excluded from using this template in the Template Qualification Form. The applicability of the referenced permit shield has been restricted to apply to the permit unit and not to the entire source. It is obvious units qualifying to use this template will not trigger applicability of District Rules 4623 without significant modification, which would require an Authority to Construct and new Operating Permit. No additional conditions are necessary to ensure non-applicability of the requirements of this rule to units using this template.

19. **EPA COMMENT**

The District grants a permit shield from the requirements of 40 CFR Subpart XX, based on the fact that sources qualified to use the template are not associated with bulk gasoline terminals. Since the definition of a bulk gasoline terminal turns on a throughput limit of greater than 75,700 liters per day, the District must add enforceable permit conditions that prohibit exceedance of this throughput and require recordkeeping.

DISTRICT RESPONSE

The applicability of the referenced permit shield has been restricted to apply to the permit unit and not to the entire source. Pursuant to 40 CFR Subpart XX, Applicability, the affected facility is the total of all the loading racks at a bulk gasoline terminal which

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deliver liquid product into gasoline tank trucks. Units qualifying to use this template are not loading racks and would require significant modification to perform as such, which in turn would require a new permit. Therefore, 40 CFR Subpart XX is not applicable to units qualifying to use this template.

APPENDIX D

TEMPLATE QUALIFICATION FORM
FOR
TEMPLATE #SJV-GS-1-0

Template SJV-GS-1-0

Title V General Permit Template Qualification Form

District permit # _____

Please answer the questions in the table below. A gasoline dispensing facility (unit) which meets the criteria of this table is qualified to use this template as part of a Title V application. To use this template, remove this sheet and attach to application.

Yes es	No	Description of Qualifying Units
		Is the facility a gasoline storage and dispensing facility (see Appendix A), equipped with ARB certified Phase I and Phase II vapor recovery? [District Rule 4622, 2.0, 3.1, 3.3] If "yes," continue to the next question; otherwise STOP - you cannot use this template.
		Is the unit associated with loading at a bulk gasoline terminal (see Appendix A)? [40CFR§60.501] If "no," continue to the next question; otherwise STOP - you cannot use this template.
		Does the facility serve to store gasoline (see Appendix A) in a stationary storage container with a capacity greater than 250 gallons? [District Rule 4621, 5.1.1] If "yes," continue to the next question; otherwise STOP - you cannot use this template.
		Is the unit an internal or external floating roof tank with capacity of 19,800 gallons or more? [District Rule 4623, 5.1, 5.2] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit used for transfer of gasoline into a delivery vessel or for loading at a gasoline bulk plant (see Appendix A)? [District Rule 4621, 2.0, 3.2, 3.3] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit a component serving light crude oil or gases at a light crude oil and gas production facility, or a component serving natural gas processing? [District Rule 4403, 2.0] If "no," continue to the next question, otherwise STOP - you cannot use this template.
		Is the unit associated with loading at an organic liquid loading facility (see Appendix A)? [District Rule 4624, 2.0, 3.2, 3.3, 3.8] If "yes", you cannot use this template; otherwise you qualify to use this template.

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true, accurate, and complete, and 2) the facility is in compliance with this template's permit conditions:

Signature of Responsible Official

Date

Name of Responsible Official (Please print)

